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August 22, 2017

Via ECF Only

Honorable Sean H. Lane
U.S. Bankruptcy Court
One Bowling Green
New York, NY 10004

Re: Second Southern Baptist Church of New York
Chapter 11 Case No. 15-12509

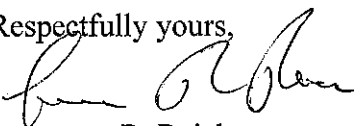
Dear Judge Lane:

As you will recall there was conducted before the Court on the record yesterday a public auction of the above-referenced Debtor's real property. The successful bidder was Ravi Annamaneni ("Annamaneni") with a bid of \$2,450,000.00. The second bidder was S6 Realty Corp. ("S6") with the backup bid in the amount of \$2,400,000.00. A proposed order has been submitted to the Court as directed at the close of the auction approving (i) Purchase Agreement with Annamaneni, (ii) Sale Free and Clear of all Liens, Claims, Interests and Encumbrances and (iii) Assumption and Assignment of Leases.

Today, the attorney for S6, Edward L. Shendell, has transmitted to us an affidavit outlining alleged post-auction sale discussions, to which he was a party, between representatives of S6 and Annamaneni. He has also forwarded to us an affidavit from his client's representative, Shalev Shoshani, which refers not only to the conversation referred to in Mr. Shendell's affidavit but also to alleged additional discussions between Mr. Shoshani and Mr. Annamaneni as to which Mr. Shendell was not present. Copies of each of the aforesaid affidavits are attached.

We felt that, as an officer of the Court, with the knowledge and consent of Mr. Shendell and his client, we needed to submit the affidavits to the Court, with a copy to the U.S. Trustee's Office for such action as the Court may wish to take.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Lawrence R. Reich', written over the typed name.

Lawrence R. Reich

LRR/sn

Enc.

cc: Edward L. Shendell, Esq. - eshendellesq@gmail.com
Mario Delbrun - mariodelbrun@aol.com
Ravi Annamaneni - ravirx@gmail.com
Andrea B. Schwartz, Esq. - andrea.b.schwartz@usdoj.gov
Kelly Ross - kelly@mkpropertynyc.com
Nickolas Karavolas, Esq. - nkaravolas@phillipslytle.com

AFFIDAVIT OF SHALEV SHOSHANI

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

The undersigned, Shalev Shoshani, being duly sworn on his oath, deposes and says:

1. I participated in a property auction held on August 21, 2017 as part of a Chapter 11 case pending in the United States Bankruptcy Court, Southern District of New York, Case No.15-12509-SHL;

2. After the auction, I engaged in a conversation outside the court house with Ravi Annamaneni ("RA"), the winner of the property auction, a friend of RA's ("RA friend") and Edward L. Shendell ("Shendell"), my attorney.

3. During the conversation, while Shendell was present:

(a) RA wanted to know why I kept bidding and stated that he is a pharmacist and has no experience in real estate;

(b) I asked RA why he kept bidding if has no real estate experience and RA stated that he kept bidding because he thought that my father and I are "real estate guys" and must know what we are doing and know that the property is worth the bids being made in the auction;

(c) RA stated doesn't know how he will pay for the property because he does not have the funds to close the purchase of the property that he had just been the successful bidder on;

(d) RA asked if there was some way to get his deposit back if he did not buy the property & Shendell advised him that he had made a commitment in Bankruptcy Court and would lose his deposit; and

(e) Shendell asked RA why he did not have an attorney advising him and RA seemed to shrug off the question and did not answer. He stated that he planned to get an attorney now.

4. After Shendell left the conversation, I continued talking to RA and RA's friend:


(a) RA stated that he only has \$700,000.00 and that he had a friend wire several million dollars into RA's bank account so that RA could qualify to bid on the property and that the funds were wired back to his friend; and

(b) RA asked me if I would be willing to pay him \$100,000 to take the contract to

purchase the property and I said no; and

(c) RA asked for my telephone number in case we (my father and I) wanted to be partners with him on the property. I said no to being partners, but did give him my telephone number.

5. About 25 minutes after I left RA and RA's friend outside the court house, RA called me and told me that if he could get his deposit back and I would give him \$100,000.00, he would give me the contract to buy the property. I again told RA no to this. RA again told me that he only kept bidding because he believed that my father and I knew something about the property. RA also said that he became a bidder because he is a tenant at the property and wanted to protect his lease. RA again said that he does not know how to come up with the rest of the money to buy the property for the amount that he bid in the auction.



Shalev Shoshani

8-12-2017

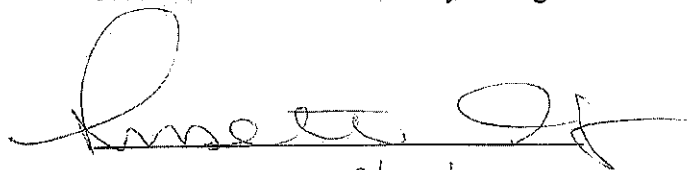
STATE OF NEW YORK

COUNTY OF ~~NEW YORK~~

)

ss.:

On the 22nd day of August, 2017 before me, the undersigned, personally appeared Shalev Shoshani, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within affidavit and acknowledged to me that he executed the same and that by his signature on the affidavit he executed the affidavit.



Notary Public

8/22/17

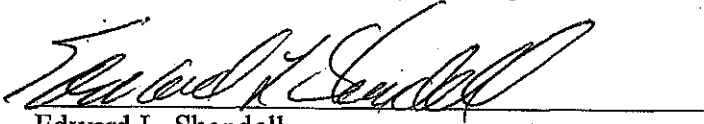
LISSETTE APOLO
NOTARY PUBLIC-STATE OF NEW YORK
NO. 01AP6319820
QUALIFIED IN QUEENS COUNTY
MY COMMISSION EXPIRES 02-23-2019

AFFIDAVIT OF EDWARD L. SHENDELL

STATE OF NEW YORK)
)
COUNTY OF NASSAU) ss.:

The undersigned, Edward Shendell, being duly sworn on his oath, deposes and says:

1. I am an attorney admitted to the practice of law in the State of New York and am counsel to Shlomo Shoshani, Shalev Shoshani and S6 Realty Corp.
2. I attended a property auction held on August 21, 2017 as part of a Chapter 11 case pending in the United States Bankruptcy Court, Southern District of New York, Case No.15-12509-SHL;
3. After the auction, I engaged in a conversation outside the court house with Shalev Shoshani ("Shoshani"), Ravi Annamaneni ("RA"), the winner of the property auction, and a friend of RA's ("RA friend").
4. During the conversation while I was present:
 - (a) RA wanted to know why Shoshani kept bidding and stated that he is a pharmacist and has no experience in real estate;
 - (b) Shoshani asked RA why he kept bidding if has no real estate experience and RA stated that he kept bidding because he thought that Shoshani and his father are "real estate guys" and must know what they are doing and know that the property is worth the bids being made in the auction;
 - (c) RA stated doesn't know how he will pay for the property because he does not have the funds to close the purchase of the property that he had just been the successful bidder on;
 - (d) RA asked if there was some way to get his deposit back if he did not buy the property & I told him that he had made a commitment in Bankruptcy Court and would lose his deposit; and
 - (e) I asked RA why he did not have an attorney advising him and RA stated that he planned to get an attorney now. He did not answer why he did not have an attorney.
5. At this time, I walked away, leaving the conversation.


Edward L. Shendell

STATE OF NEW YORK)

COUNTY OF NASSAU)

ss.:

On the 22nd day of August, 2017 before me, the undersigned, personally appeared Edward L. Shendell, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within affidavit and acknowledged to me that he executed the same and that by his signature on the affidavit he executed the affidavit.



Notary Public

